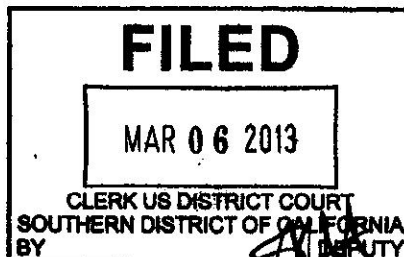


* Return Copy *

(Name) Matthew Alan Lawrie
 (Address) 900 Quebec Avenue
 (City, State, Zip) Corcoran, California 93212
 (CDC Inmate No.) F-74464



2254	1983
FILING FEE PAID	
Yes	No
IFP MOTION FILED	
Yes	No
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Court	ProSe

First Amended
Version

United States District Court
Southern District of California

Matthew Alan Lawrie
 (Enter full name of plaintiff in this action.)

State of California Plaintiff,
 v. Robert Lawrie,
Trent Lott,
County of San Diego,
Merrill Lynch,
James A. Schmiesing,
Steven Huskins,
Alice Y. Lawrie/Rodriguez,
 (Enter full name of each defendant in this action.)

Blumberg Dagan LLP Defendant(s).
and does 1-100

13CV0539 LAB WVG

Civil Case No. _____
 (To be supplied by Court Clerk)

Complaint Under the
 Civil Rights Act
 42 U.S.C. § 1983

A. Jurisdiction

Jurisdiction is invoked pursuant to 28 U.S.C. § 1343(a)(3) and 42 U.S.C. § 1983. If you wish to assert jurisdiction under different or additional authority, list them below.

" Due Process "

B. Parties

1. Plaintiff: This complaint alleges that the civil rights of Plaintiff, Matthew Alan Lawrie
 (print Plaintiff's name)
 , who presently resides at 900 Quebec Avenue
 (mailing address or place of confinement)
Corcoran, California 93212, were violated by the actions

of the below named individuals. The actions were directed against Plaintiff at San Diego, California
Vista Superior Court Dept. 4 on (dates) 7/24/06, 7/7/06, and 1/15/02.

(institution/place where violation occurred)

(Count 1)

(Count 2)

(Count 3)

2. Defendants: (Attach same information on additional pages if you are naming more than 4 defendants.)

Defendant Robert Lawrie
(name)

resides in Alabama, Jasper
(County of residence)

and is employed as a Retired Consultant for Lawrie & Co. This defendant is sued in
(defendant's position/title (if any))

his/her ~~individual~~ ☒ official capacity. (Check one or both.) Explain how this defendant was acting

under color of law: My Uncle, Robert Lawrie Committed fraud when he reported that an IRA 272-81615 was outside of Alan F. Lawrie Trust Causing Plaintiff to lose over \$50,000,000⁰⁰ from estate and caused 7-7-06 PN26595 Court order for Taxes on my inheritance under false pretenses.

Defendant Trent Lott
(name)

resides in Mississippi USA
(County of residence)

and is employed as a Former Senator and Republican Whip This defendant is sued in
(defendant's position/title (if any))

his/her ~~individual~~ ☒ official capacity. (Check one or both.) Explain how this defendant was acting

under color of law: Trent Lott, Mastermind of Alan F. Lawrie will trust fraud.

During the Month of January I tried to Contest my dads will. In February I filed Pl 83751 Contest in Superior Court. During February of 2003 The Then Senator Trent Lott and his wife in their green Chrysler Town & Country Van with faux wool trim threatened me at Quivera basin at my boat dock about my dads will.

Defendant County of San Diego Judge Cline resides in San Diego (Vista) California,
(name) (County of residence)

and is employed as a Judge of Probate Court dept 4 This defendant is sued in
(defendant's position/title (if any))

his/her ~~individual~~ ☒ official capacity. (Check one or both.) Explain how this defendant was acting

under color of law: Judge cline accepted false information from defendants to defraud plaintiff of over 50,000,000⁰⁰ and the 140,000,00 in taxes when on 7-7-06 he ordered on PN26595 that Plaintiff had received Money from outside The A.F.L. Trust when actually 272-81615 is in the trust...

Defendant Merrill Lynch, Karen Merker resides in San Diego California 92101
(name) (County of residence)

and is employed as a Manager of Alan F. Lawrie Stock This defendant is sued in
(defendant's position/title (if any))

his/her ~~individual~~ ☒ official capacity. (Check one or both.) Explain how this defendant was acting

under color of law: Merrill Lynch and the broker/manager Karen Merker

acted as "mastermind of fraud" by first Manipulating Stock Reports on Alan F. Lawrie Trust, Stock Portfolio by creating false accounts, hiding the IRA 272-81615 from Plaintiff who is beneficiary of will also. Then Karen merker and Company helped write a forged will! The handwriting of all account Contracts match the writing and Signatures of the Notary Public's Signature, which is spelled incorrectly. Merrill Lynch is responsible party and guardian of records on Alan F. Lawrie Stock Portfolio and assisted all defendants when they deceived Plaintiff in 2002, 2003, and in 2006. The attorney for Merrill Lynch Eric Glassman sent Plaintiff The Contract of 272-81615, Showing Alan F. Lawrie wrote; 50/50 split for \$ to Matt, Yvonne Lawrie 2609,200⁰⁰. Merrill Lynch also Embezzled Money!

C. Causes of Action (You may attach additional pages alleging other causes of action and the facts supporting them if necessary.)

Count 1: The following civil right has been violated: Due Process, ~~Right to Life~~,
(E.g., right to medical care, access to courts,

due process, free speech, freedom of religion, freedom of association, freedom from cruel and unusual punishment, etc.)

Supporting Facts: [Include all facts you consider important to Count 1. State what happened clearly and in your own words. You need not cite legal authority or argument. Be certain to describe exactly what each defendant, by name, did to violate the right alleged in Count 1.]

* THE VIOLATION OF Due Process was on 7-7-06 when the Superior Court at Vista, California made its poor decision to grant petitioner on PN26595 to allow taxes for 140,477 ⁰⁰ against plaintiff when the information was incorrectly stated in petition. Due Process was violated against plaintiff when the judge did not review any IRA or will material before making this order. All other defendants from 2002 - 2006 assisted in this fraud: First Robert Lawrie, Trent Lott, the County of San Diego Judge Cline, then Merrill Lynch Karen Merker, Drew Cunningham broker FA# 3016 and his Secretary who forged the AFL Will's Notary Public Signature. James A. Schmiesing the attorney for Alice Y. Lawrie/Rodriguez who falsely and knowingly put forth PN26595 petition to defraud plaintiff of various rights of 140,477 ⁰⁰ and to block fair trial for SCN160404 by blocking funds. Also, blocking facts that bolster plaintiff assertions that Will is forged. AFL Trust 272-81615 IRA in will. IRA 272-81615 50/50 split AFL will gives 200K at 8K per month. Why would anyone give 300K on IRA 272-81615 then piece meal out 8K per month for son who in will in reality should get 50% split?!

Seven Hoskins hid truth from plaintiff, client and gave Trent-Lott my whereabouts so he could threaten my life, son's family!

Blumberg, Dagan acted as puppets in whole masquerade by continuing lie that money was given to plaintiff in 2003 from "outside the trust" as seen in PN26595, but it's a lie!

Count 2: The following civil right has been violated: _____
(E.g., right to medical care, access to courts,

due process, free speech, freedom of religion, freedom of association, freedom from cruel and unusual punishment, etc.)

Supporting Facts: [Include all facts you consider important to Count 2. State what happened clearly and in your own words. You need not cite legal authority or argument. Be certain to describe exactly what each defendant, *by name*, did to violate the right alleged in Count 2.]

Count 3: The following civil right has been violated: _____

(E.g., right to medical care, access to courts,

due process, free speech, freedom of religion, freedom of association, freedom from cruel and unusual punishment, etc.)

Supporting Facts: [Include all facts you consider important to Count 3. State what happened clearly and in your own words. You need not cite legal authority or argument. Be certain to describe exactly what each defendant, by name, did to violate the right alleged in Count 3.]

D. Previous Lawsuits and Administrative Relief

1. Have you filed other lawsuits in state or federal courts dealing with the same or similar facts involved in this case? ~~Yes~~ ☒ No. *These are New facts with New items of evidence from IRS 11/27/12 and Merrill Lynch 272-81615 2/5/13*

If your answer is "Yes", describe each suit in the space below. [If more than one, attach additional pages providing the same information as below.]

(a) Parties to the previous lawsuit:

Plaintiffs: _____

Defendants: _____

(b) Name of the court and docket number: _____

(c) Disposition: [For example, was the case dismissed, appealed, or still pending?] _____

(d) Issues raised: _____

(e) Approximate date case was filed: _____

(f) Approximate date of disposition: _____

2. Have you previously sought and exhausted all forms of informal or formal relief from the proper administrative officials regarding the acts alleged in Part C above? [E.g., CDC Inmate/Parolee Appeal Form 602, etc.] ? ☐ Yes ☒ No. **NOT PRISON MATTER!**

If your answer is "Yes", briefly describe how relief was sought and the results. If your answer is "No", briefly explain why administrative relief was not sought.

This is not in the CDC jurisdiction. But I have notified FBI Keith Slotter SAC (858) 565-1255 and he is assisting in a non official manner (NOC = Plaintiff) I correspond w/ slotter and report often but require better methods of Communication please. In the interest of JUSTICE!"

E. Request for Relief

Plaintiff requests that this Court grant the following relief:

1. An injunction preventing defendant(s): Access to Alan F. Lawrie Trust.

2. Damages in the sum of \$ TBA

3. Punitive damages in the sum of \$ TBA

4. Other: TBA

I just want what is supposed to be mine from my dad 50%.

F. Demand for Jury Trial

Plaintiff demands a trial by ☒ Jury ☐ Court. (Choose one.)

G. Consent to Magistrate Judge Jurisdiction

In order to insure the just, speedy and inexpensive determination of Section 1983 Prisoner cases filed in this district, the Court has adopted a case assignment involving direct assignment of these cases to magistrate judges to conduct all proceedings including jury or bench trial and the entry of final judgment on consent of all the parties under 28 U.S.C. § 636(c), thus waiving the right to proceed before a district judge. The parties are free to withhold consent without adverse substantive consequences.

The Court encourages parties to utilize this efficient and expeditious program for case resolution due to the trial judge quality of the magistrate judges and to maximize access to the court system in a district where the criminal case loads severely limits the availability of the district judges for trial of civil cases. Consent to a magistrate judge will likely result in an earlier trial date. If you request that a district judge be designated to decide dispositive motions and try your case, a magistrate judge will nevertheless hear and decide all non-dispositive motions and will hear and issue a recommendation to the district judge as to all dispositive motions.

You may consent to have a magistrate judge conduct any and all further proceedings in this case, including trial, and the entry of final judgment by indicating your consent below.

Choose only one of the following:

☐ Plaintiff consents to magistrate judge jurisdiction as set forth above.

OR

☒ Plaintiff requests that a district judge be designated to decide dispositive matters and trial in this case.

I declare under the penalty of perjury that the foregoing is true and correct.

2/26/13
Date

Matthew Alan Lawrie
Signature of Plaintiff

Matthew Alan Lawrie

Return Copy

15

Matthew Alan Lawrie, F-74464

United States Courts

900 Quebec Ave.

Southern District of California

Carrsboro, Ca 93212

Civil Case No.

In Proper

Memorandum of Points and

(559) 992-7100

authorities and Notice of

Exhibits in Support of

Lawrie V. County, does 1-100

"Complaint 42 USC 1983"

Violation of Due Process

I Matthew Alan Lawrie hereby Submit the Notice of Memorandum of Points and authorities and Exhibit in Support of this Complaint that my Due process rights were Violated by the County of San Diego, Robert Lawrie, Trent Lott, Merrill Lynch, James A. Schmiesing, Steven Huskins, Alice-Yvonne Lawrie / Rodriguez, Blumberg Dagan LLP and does 1-100.

The EXHIBITS shown following this page show Course of deceit and fraud which did so Violate Plaintiff's "due process rights".

1) Merrill Lynch Contract of Alan F. Lawrie dated: 11/26/97 IRA 272-81615 50%-50% (IN TRUST)

2) Merrill Lynch Portfolio 272-81615 11/29/2002 = 274,564.76 "origin of Money Plaintiff received 2003"

3) Merrill Lynch 272-81615 account Plan Value 609,658.29 "origin of Plaintiff's Money 272-85850"

4) Merrill Lynch Page 1 of 272-85850 Valued 176,677.28 balance of Split on 272-81615

5) Susan Stricklin Wilson, Attorney declaration for production of will for client Lawrie

6) Page 1 of AFL Will

7) Page 3 of AFL Will which alleges 200,000⁰⁰ in trust for plaintiff at 8,000⁰⁰ mo

8) Page 4 of AFL Will per 8,000⁰⁰ month which is contradiction to 272-81615 50/50!

9) EXHIBIT B of Notary Signature which is spelled wrong and T-J mixed and

is 100% identical to Merrill Lynch Secretary's writing on all Contracts. ! Forgery !

10) AFL Will, Trust Assets See particularly # 4 b IRA 272-81615 "IN TRUST" !

Note:

Sent Copy w/envelope 2/5/13 from Glassman

As 17 B ex page typed/styled to p. 17.

- 1) Petition by James A. Schmiesing dated. 7/24/06 for Alice Y. Lawrie/Rodriguez
- 2) Superior Court minutes of Judge Cline Sept. 4 PN26595 7/7/06 which
- 3 is oddly dated before the petition. Why is order before petition? Unless
- 4 this Court thought it was party to this action and acted on its own.
- 5) Page 2 PN26595 order 7-7-06 (Matthew also received \$266,100.00
- 6 Consisting of IRA "outside the trust" for a total of \$466,111.00) which
- 7 allowed: Taxation without proclamation to occur and fraud which
- 8 Violated plaintiffs "due process" and is the Cause of this action.
- 9) letter from Court giving jurisdiction of probate to another Court.
- 10) IRS 272-81615 falsely reported as 2,100.00 distribution but
- 11 Correctly admitted at beneficiary status. Merrill Lynch Committee fraud
- 12 to IRS! See NEXT Page 272-85850 \$156,878.00 from? (272-81615)
- 13) Ex 12 CEC G00027 P50
- 14) Proof of Service Merrill Lynch fired broker Drew Cunningham F.O. 3016
- 15) letter from Merrill Lynch by Amanda Hall 6/27/11
- 16) Copy of envelope from Merrill Lynch Rec. 10/8/11.
- 17) letter from SEC atty. Leslie M. Garner
- 18) IRS letter 10/30/12 Shows NO TAXES PAID BY TRUSTEE PER PN26595
- 19) OSC w/ attorney Eric J. Glassman where he tried to give false name to
- 20 Court. EX. 27 B ENVELOPE FROM ERIC J. GLASSMAN W/ 272-81615
- 21) letter from ERIC J. Glassman in objection
- 22) letters from Comptroller of the Currency Administrator of National Banks.
- 23) D.O.J letter 10/22/12
- 24) letter from F.B.I
- 25) My letter to F. BI dated 1/3/13
- 26) Summons to Steven Flaskins
- 27) Civil Complaint Lawrie V. Flaskins
- 28) Proof of Service by Susan Stricklin Wilson

3/ 11-57188 Ninth Circuit denial due to the
violation of the Constitutional Right to:
"Due process"

I Matthew Alan Lawrie the plaintiff hereby
submit these exhibits in support of my allegations
that all of the defendants sought to deprave
me of my Constitutional rights to "due process"
on 7-7-06 and before and after and currently
without Money due to me in will I was wrongly
found guilty in SCN160404 because I had no
Money to fight my case and I could not call
witnesses nor hire competent representation.

All the defendants sought to deprave me from
the murder of my late father Mr. Alan F. Lawrie
in October 2002 where Alice Y. Lawrie shot my
dad with a shotgun at 3693 Pines Rd Escondido,
California, then she had a fake burial after she had
my dad cremated to cover-up crime. Crime was
murder and she would not have received Money
from estate equal to \$100,000,000⁰⁰ in Merrill Lynch.
all defendants did act in Coersion and unity.

I Matthew Alan Lawrie hereby submit this under
the laws of perjury under the laws of California as
true and correct.

Dated: 2/26/13

Matthew Alan Lawrie
Matthew Alan Lawrie

JS 44 (Rev. 12/12)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Matthew Alan Lawrie
F-74464

DEFENDANTS

State of California, et al.

MAR 06 2013

(b) County of Residence of First Listed Plaintiff **Kings**
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant
(IN U.S. PLAINTIFF CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED)

(c) Attorneys (Firm Name, Address, and Telephone Number)
Matthew Alan Lawrie
900 Quebec Ave
Corcoran CA 93212

2254 1983
FILING FEE PAID
Yes No
IFP MOTION FILED
Yes No

Attorneys (If Known)

13CV0539 LAB WVG

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
☒ 3 Federal Question (U.S. Government Not a Party)
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

COPIES SENT TO SHIPMENT OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)
(For Diversity Cases Only)
Court Pro Se
PTF DEF
☐ 1 ☐ 1 Incorporated or Principal Place of Business In This State
☐ 2 ☐ 2 Incorporated and Principal Place of Business In Another State
☐ 3 ☐ 3 Foreign Nation
☐ 4 ☐ 4
☐ 5 ☐ 5
☐ 6 ☐ 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input checked="" type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from Another District (specify)
☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42:1983

Brief description of cause:
Prisoner Civil Rights

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See Instructions):

JUDGE

DOCKET NUMBER

DATE
03/06/2013

SIGNATURE OF ATTORNEY OF RECORD

s/ SKHoestenbach

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

CSATE/STATE PRISON AT CORCORAN

P.O. 5246

CORCORAN, CA 93212

NAME Matthew Alan Thwie

NUMBER T-74467

HOUSING E-5, All Low

other, was evidence

STATE PRISON "Inmate"

GENERATED MAIL

United States District Court

Southern District of California

Office of the Clerk

Edward J. Debrauty Federal Building

880 Front Street

Room 7290

San Diego, CA 92101-8829

U.S.A.



UNITED STATES
02 1M
0004284592
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FINE V. BODINE S.

2/28/13
Gray

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MAR 05 2013
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
DEPUTY

STATES POSTAL